

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE

REGULATORY CONTACT RECORD

Date/Time: July 2, 2003/ 3:30 p.m.

Site Contact(s): Carolyn Hicks
Phone: (303) 966-5773

Regulatory Contact: James Hindman
Phone: (303) 692-3345

Agency: CDPHE

Purpose of Contact: Clarify closure performance standards in B707 Decommissioning Operations Plan

Discussion:

The B707 project is planning to hydrolase the floors to meet both RCRA closure and radiological free-release standards. In the B707 DOP, there are two relevant closure options:

- Clean closure option #3 (section 6.1.1) can be used when the floor will be left in place after facility demolition, and requires hydrolasing (or another abrasive technique) followed by visual inspection and meeting the radiological unrestricted release criteria. This option has no specific removal depth criteria for the concrete.
- Unit removal in conjunction with debris rule treatment (section 6.1.2) can be used where the structure will be removed and discarded. This option requires application of a technology from Part 268.45 Table 1, and compliance with debris standards. For hydrolasing concrete, the applicable standard would be removal of 0.6 cm (0.24 in.) of the surface layer, and meeting the "clean debris surface" visual standard.

We wished to clarify two questions:

1. Since the final decision has not yet been made whether the B707 slab will be left in place after demolition, can we use clean closure option #3, and then later decide to remove the concrete after demolition and manage as non-regulated waste?
2. The DOP states that a P.E. certification is required for units undergoing clean closure under section 6.1.1, and a P.E. certification is not required for units closed by removal. If we close under clean closure option #3 and later decide to remove the slab, is a P.E. certification required?

Mr. Hindman responded that units closed under clean closure option #3 could later be removed and managed as non-regulated waste, because once CDPHE concurs with closure, the unit is no longer subject to regulation. Also, intuitively, if the closure performance standard is protective for concrete left in place, it would be protective for concrete disposed of as waste (this material is not slated for reuse on site as backfill). A P.E. certification would be required unless the hydrolasing met the debris treatment standards specified in section 6.1.2.

Contact Record Prepared by: Carolyn Hicks

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